

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

DARRELL RAY SEALE,

*Defendant.*

Case No. 1:25-MJ-355

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Marc Esposito, being duly sworn, depose and state:

1. Your affiant, Marc Esposito, is a Special Agent with the Federal Bureau of Investigation (“FBI”) assigned to the Washington Field Office. I have been a Special Agent since February of 2019, during which time I have investigated criminal violations involving international terrorism, domestic terrorism, and crimes aboard aircraft. As a Special Agent, I am authorized by law or by a Government agency to engage in or supervise the prevention, detection, investigation, or prosecution of a violation of federal criminal laws. Since February 2019, I have been assigned to the Washington Field Office (“WFO”) of the FBI, where I investigate violations of federal law that occur within the airport environment and on-board aircrafts. I am familiar with the relevant federal statutes, including under Titles 18 and 49 of the United States Code, and have conducted numerous investigations into offenses that have occurred upon an aircraft.

2. This affidavit is submitted in support of a criminal complaint for DARRELL RAY SEALE (“SEALE”), who, within the special aircraft jurisdiction of the United States, knowingly engaged in sexual contact with another person without that person’s permission, in violation of

Title 18, United States Code, Section 2244(b), Abusive Sexual Contact, and Title 49, United States Code, Section 46506.

3. The facts set forth in this statement of probable cause are based on my personal observations, my training and experience, and information obtained from other law enforcement officers and witnesses. This affidavit contains information necessary to support probable cause and is not intended to include each and every fact or matter observed by me or known to the United States.

#### **SUMMARY OF FACTS TO SUPPORT PROBABLE CAUSE**

4. The FBI was contacted by the Metropolitan Washington Airports Authority Police Department (“MWAAPD”) on or about June 6, 2025, regarding an alleged sexual assault that occurred onboard American Airlines Flight 4349 with nonstop service between Boston, Massachusetts (“BOS”) and Ronald Reagan Washington National Airport (“DCA”).

5. During the flight, the subject, later identified as DARRELL RAY SEALE, who was seated in 11A, allegedly sexually assaulted the passenger sitting next to him. The VICTIM (“V-1”) was seated next to SEALE in the aisle seat. V-1 reported that, while the flight was in the air, SEALE was masturbating through his shorts, rubbing his penis. SEALE then lowered his tray table and then began touching V-1’s penis over his pants. V-1 told him to stop by raising his hand, but SEALE continued to touch V-1 by putting his fingers through the hole in V-1’s pants and rubbing V-1’s leg. V-1 got up to notify a flight attendant and was reseated for the remainder of the flight.

6. An eyewitness (“W-1”) seated across the aisle from V-1 observed SEALE’s hand on V-1’s left thigh. W-1 later observed SEALE’s hand on V-1’s crotch and observed him fondle V-1’s penis. W-1 also witnessed V-1 “raise [V-1]’s right hand” towards SEALE to “make the

universal ‘stop’ sign.” W-1 observed that after the “stop” gesture, SEALE initially removed his hand from V-1. However, W-1 then observed SEALE once again touching V-1’s thigh.

7. During this incident, W-1 typed a message on W-1’s phone stating “Are you okay?” and showed it to V-1. V-1 read the message and shook his head “no.”

8. After the flight landed on June 6 at DCA, SEALE, W-1, and V-1 were removed from the airplane and provided written statements about what occurred. Your affiant spoke to SEALE, who acknowledged sitting next to V-1 and to possibly making contact with him while stretching his arms but denied ever touching him in a sexual way and denied ever exposing his own genitalia. SEALE stated that V-1 changed seats during the flight after SEALE used the restroom.

9. Two days later, on Sunday June 8, SEALE was arrested prior to boarding a departing flight from DCA. After *Miranda* warnings, he agreed to speak further with me. He again denied that he touched V-1 in any sexual way, but acknowledged that he observed V-1 put up his hand in the “stop” signal. SEALE said he believed V-1 was telling him to stop touching him while stretching.

**CONCLUSION**

10. Based upon the foregoing, I submit there is probable cause to believe that on or about June 6, 2025, in the Eastern District of Virginia, the defendant, SEALE, on an aircraft in the special aircraft jurisdiction of the United States, namely American Airlines flight 4349 flying from nonstop from Boston, MA to DCA, did commit Abusive Sexual Contact by knowingly engaging in sexual contact with another person without that person's permission, in violation of Title 18, United States Code, Section 2244(b) and Title 49, United States Code, Section 46506.

Respectfully submitted,



Marc Esposito  
Special Agent  
Federal Bureau of Investigations

Respectfully submitted and attested to in  
accordance with the requirements of Fed. R.  
Crim. P. 4.1 by telephone on June 9, 2025.

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The Honorable Lindsey R. Vaala  
United States Magistrate Judge  
Alexandria, Virginia